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9 UNIVERSITY OF NORTHERN
10 CALIFORNIA FOUNDATION
11 and Y. KING LIU
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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 JOHN STALCUP, DENNIS McGOWAN,
17 and MICHAEL LYSTER,

18 Plaintiffs,

19 vs.

20 Y. KING LIU, UNIVERSITY OF
21 NORTHERN CALIFORNIA
22 FOUNDATION,
23

24 Defendants.

25 Case No. C 11-00002 JSW

26 **STIPULATION TO CONTINUE CASE
27 MANAGEMENT CONFERENCE
28 ORDER THEREON AND ORDER
REGARDING MOTION HEARING**
DATE: April 15, 2011
TIME: 1:30pm
COURTROOM: 2, 17th floor
JUDGE: Hon. Jeffrey White

1 Pursuant to Local Rule 6-2, Plaintiffs John Stalcup, Dennis McGowan, and Michael Lyster, and
 2 Defendants University of Northern California Foundation (“UNCF”) and Y. King Liu (Chairman of the
 3 Board, University of Northern California Foundation) hereby stipulate and agree to continue the case
 4 management conference by approximately six weeks.

5 Previously, the parties have stipulated to extensions of time regarding Defendants' deadlines to
 6 file a motion to dismiss or otherwise respond to the complaint and Plaintiffs' deadline to file a motion
 7 for remand. [Docket Nos. 8 and 10] Such extensions were intended to facilitate the parties' settlement
 8 discussions, in an effort to resolve this case in an efficient manner.

9 On March 1, 2011, the parties engaged in private mediation in an attempt to resolve their
 10 disputes. On March 21, 2011, Plaintiffs provided Defendants with a term sheet for consideration. The
 11 parties are still, therefore, engaged in settlement discussions. Under the current schedule, however, the
 12 Court's initial case management conference is set for April 15, 2011; the parties' Joint Case Management
 13 Statement and initial disclosures under Rule 26(a)(1) are currently due on April 8, 2011; and the parties
 14 must meet and confer under Rule 26(f)(1) by March 25, 2011. Continuance of the case management
 15 conference and, accordingly, all other deadlines triggered by the date of that conference, will help to
 16 facilitate the parties' ongoing settlement discussions.

17 Accordingly, the parties request that the Court's initial case management conference be
 18 continued from April 15, 2011 to June 10, 2011 or any date shortly thereafter, excluding the period of
 19 July 15-31, 2011, when counsel are not available. (Alternatively, if the Court is unavailable on June 10,
 20 2011, then the parties would agree to a case management conference for May 27, 2011).

21 The parties do not believe that this modest extension of time will have any effect on the schedule
 22 for this case.

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1 IT IS SO STIPULATED THIS 23rd day of March, 2011.
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3 Dated: March 23, 2011

HOGAN LOVELLS US LLP

4 By: /s/ Constance F. Ramos

5 Constance F. Ramos

6 Attorneys for Defendants UNIVERSITY OF
7 NORTHERN CALIFORNIA FOUNDATION
and Y. KING LIU

8 Dated: March 23, 2011

9 FLAXMAN & BLAKELY

10 By: /s/ Bruce W. Blakely

11 Bruce W. Blakely

12 Attorneys for Plaintiffs JOHN STALCUP,
13 DENNIS McGOWAN, and MICHAEL
LYSTER

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15 The Initial Case Management Conference is continued to June 10, 2011 at 1:30 . IT IS SO
16 If the parties also seek a continuance of the motion hearing scheduled for March 25,
17 ORDERED. 2011 at 9:00 a.m., they should submit the appropriate request to the Court.

18 March 23, 2011

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20 JEFFREY S. WHITE
21 UNITED STATES DISTRICT JUDGE

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25 I, Constance F. Ramos, attest that Bruce W. Blakely has read and approved the STIPULATION
26 TO CONTINUE CASE MANAGEMENT CONFERENCE and consents to its filing in this action.